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Attorneys for Plaintiff, Chanel, Inc.

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CHANEL, INC., a New York
corporation,

Plaintiff,

v.

BRIGITTE C. VAUGHN a/k/a
BRIGITTE C. SIERAU a/k/a BRIGIT
VAUGHN and BIBI, INC., individually
and jointly, d/b/a
BIBISBLINGBLING.COM d/b/a
d/b/a BIBISBLINGBLING, and Does 1-
10,

Defendants.

CASE NO. 07-CV-06057-NRB

**APPLICATION FOR ENTRY OF
CLERK'S DEFAULT AGAINST
DEFENDANT**

Plaintiff, Chanel, Inc., a New York corporation, by and through its undersigned counsel, hereby requests entry of a default by the Clerk against Defendant Brigitte C. Vaughn a/k/a Brigitte C. Sierau a/k/a Brigit Vaughn d/b/a BibisBlingBling.com d/b/a BibisBlingBling ("Defendant"), and states as follows:

1. This Court issued a Summons in the name of Defendant on June 26, 2007.

2. On September 5, 2007, Defendant was served with the Summons and a copy of Plaintiff's Complaint for Damages and Injunctive Relief. A copy of the Return of Service is attached hereto as Exhibit "1" and on file and is identified as Docket Number 3.

3. Accordingly, Defendant's response to the Complaint was due on or before September 25, 2007.

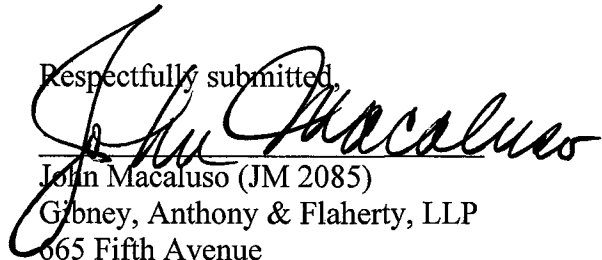
4. To date, Defendant has not filed nor served any response to the Complaint, has not requested an enlargement of time to respond to the Complaint nor has any counsel made an appearance on her behalf. Counsel for Plaintiff has reviewed the docket in this matter as evidenced by the Affidavit of John Macaluso in Support of Application for Entry of Default by Clerk, attached hereto as Exhibit "2."

5. Defendant could not be considered an infant or an incompetent person. To the best of Plaintiff's knowledge, Defendant is not in the military and the Soldier's and Sailors' Civil Relief Act of 140 does not apply.

WHEREFORE, Plaintiff, Chanel, Inc. requests that default be entered against Defendant Brigitte C. Vaughn a/k/a Brigitte C. Sierau a/k/a Brigit Vaughn d/b/a BibisBlingBling.com d/b/a BibisBlingBling

DATED this 23 day of October, 2007.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Macaluso", is written over the typed name and firm information.

John Macaluso (JM 2085)

Gibney, Anthony & Flaherty, LLP

665 Fifth Avenue

New York, New York 10022

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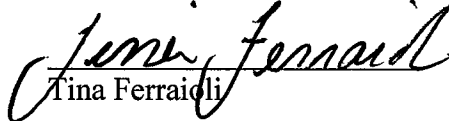
Facsimile: (212) 688-8315

E-mail: jmacaluso@gibney.com

Attorney for Plaintiff, Chanel, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was mailed this 23 day of October, 2007 to: Brigitte C. Vaughn a/k/a Brigitte C. Sierau a/k/a Brigit Vaughn at 168 Fairhaven Blvd. #10, Woodbury, New York 11797 (the address at which she was served).


Tina Ferraioli